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(OF COUNSEL)

June 5, 2007

VIA FACSIMILE (212) 805-7927

Judge Naomi R. Buchwald
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2270
New York, New York 10007

Re: Philip Hopkins, et anno. v. Visual Treasures, LLC, et al.
Case No. 07-cv-03650 (NRB)

Dear Judge Buchwald:

We represent defendant Visual Treasures, LLC ("Visual Treasures") in the above proceeding and write to respond to plaintiffs' June 4, 2007 letter to the Court.

1. Visual Treasures has no objection to the pre-motion conference with the Court as proposed by plaintiffs.


2. While plaintiffs' request for an extension of the thirty-day period may be problematic (see Handelsman v. Bedford Village Assoc. Limited Partnership, 213 F.3d 48, 50 n.2 (2d Cir. 2000)),

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Visual Treasures is willing to agree to an arrangement by which plaintiffs could defer the expense of preparing a remand motion until after the parties attempt to mediate their dispute on June 13, 2007. If this is acceptable to the Court, then Visual Treasures does not oppose plaintiffs' request for an extension of time to file their remand motion.

Respectfully submitted,


Timothy P. Kebbe
(TK-6300)

cc: Douglas J. Bilotti, Esq. (516-873-2010)
William A. Rome, Esq. (212-679-1844)